

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SANDRA LIFSHITZ, on behalf of herself  
And all others similarly situated,

Plaintiff,

v.

HEXION SPECIALTY CHEMICALS, INC.,  
et al.,  
Defendants.

CIVIL ACTION NO.  
08 Civ. 6394 (RMB)

MOTION TO ADMIT COUNSEL  
*PRO HAC VICE*

-----X  
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts  
for the Southern and Eastern District of New York, I, Roy L. Jacobs, Esquire, a member in good  
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*  
of:

Applicant's Name: Deborah R. Gross  
Firm Name: LAW OFFICES BERNARD M. GROSS, P.C.  
Address: Suite 450, Wanamaker Bldg., 100 Penn Square East  
City/State/Zip: Philadelphia, PA 19107  
Phone Number: 215-561-3600  
Fax Number: 215-561-3000

DEBORAH R. GROSS is a member in good standing of the Bar of the States of the United  
States District Court for the Eastern District of Pennsylvania; United States District Court for the  
District of Massachusetts.

There are no pending disciplinary proceeding against DEBORAH R. GROSS in any State or  
Federal Court.

Dated: August 26, 2008

Respectfully submitted,

ROY JACOBS & ASSOCIATES

BY:   
ROY L. JACOBS (RLJ-0286)

60 East 42<sup>nd</sup> Street, 46<sup>th</sup> Floor  
New York, NY 10165  
Tele: 212-867-1156  
Fax: 212-504-8343  
Email: [rjacobs@jacobsclasslaw.com](mailto:rjacobs@jacobsclasslaw.com)

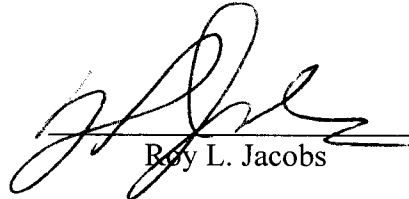
**CERTIFICATE OF SERVICE**

Roy L. Jacobs, hereby certifies that on August 26, 2008, I caused to be served, by first class mail, postage pre-paid, a copy of the Motion to Admit Deborah R. Gross as Counsel *pro hac vice*, the Declaration of Roy L. Jacobs in Support, the Affidavit of Deborah R. Gross in Support and a Proposed Order on :

William J. Sushon, Esq.  
O'MELVENY & MYERS LLP  
Seven Times Square  
New York, New York 10036

And

Robert I. Bodian, Esq.  
MINTZ LEVIN COHN FERRIS GLOVSKY &  
POPEO P.C.  
Chrysler Center  
666 Third Avenue  
New York, New York 10017



Roy L. Jacobs

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**SANDRA LIFSHITZ, on behalf of herself  
And all others similarly situated,**

**Plaintiff,**

**v.**

**HEXION SPECIALTY CHEMICALS, INC.,  
et al.,**

**Defendants.**

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**CIVIL ACTION NO.**

**08 Civ. 6394 (RMB)**

**DECLARATION OF ROY L.  
JACOBS IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

Roy L. Jacobs, declares under pain and penalty of perjury under the laws of the United States this 26<sup>th</sup> Day of August, 2008 as follows:

1. I am the principal of Roy Jacobs & Associates, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Deborah R. Gross as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in May 1976. I am also admitted to the bar *inter alia* of the United States District Court for the Southern District of New York, and am in good standing with this Court.

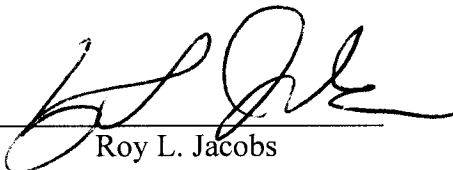
3. Have known Deborah R. Gross for approximately ten years.

4. Ms. Gross is an associate with the Law Offices Bernard M. Gross, P.C., in Philadelphia, Pennsylvania.

5. I have found Ms. Gross to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Deborah R. Gross, *pro hac vice*.

7. I respectfully submit a proposed order herewith granting the admission of Deborah R. Gross, *pro hac vice*.



Roy L. Jacobs

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SANDRA LIFSHITZ, on behalf of herself	:	CIVIL ACTION NO.
And all others similarly situated,	:	08 Civ. 6394 (RMB)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
HEXION SPECIALTY CHEMICALS, INC.,	:	
et al.,	:	
	:	
Defendants.	:	

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AFFIDAVIT OF DEBORAH R. GROSS  
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

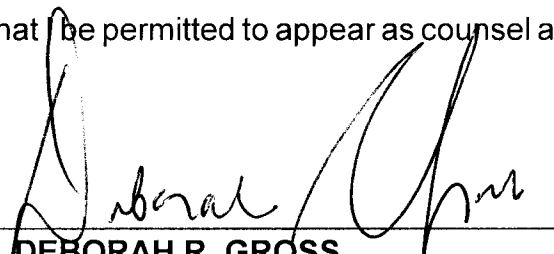
COMMONWEALTH OF PENNSYLVANIA	:	
	:	SS
COUNTY OF PHILADELPHIA	:	

DEBORAH R. GROSS being duly sworn, hereby deposes and says:

1. I am associated with the law firm of the Law Offices Bernard M. Gross, P.C.
2. I submit this Affidavit in support of the motion for my admission to practice *pro hac vice* in the above captioned matter.
3. I am a member in good standing of the bars of the States of Pennsylvania and Massachusetts, having been admitted to practice in the Supreme Court of Pennsylvania, Supreme Court of Massachusetts, United States Court of Appeals for the Third Circuit and the United States Supreme Court.
4. There are no pending disciplinary proceedings against me in any state or federal court.

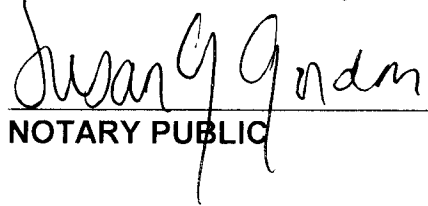
5. Wherefore, I respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this one case.

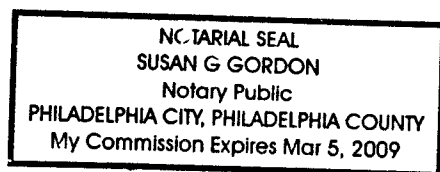
Dated:

  
DEBORAH R. GROSS

**SWORN TO AND SUBSCRIBED**

before me this 14<sup>th</sup> Day of August, 2008

  
NOTARY PUBLIC





Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***Deborah R. Gross, Esq.***

**DATE OF ADMISSION**

***November 20, 1985***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 21, 2008

A handwritten signature in black ink, reading "John W. Person, Jr." with a stylized flourish at the end.

John W. Person, Jr., Esq.  
Deputy Prothonotary



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**SANDRA LIFSHITZ, on behalf of herself**

**CIVIL ACTION NO.**

**And all others similarly situated,**

**08 Civ. 6394 (RMB)**

**Plaintiff,**

**v.**

**ORDER FOR ADMISSION  
PRO HAC VICE ON WRITTEN  
MOTION**

**HEXION SPECIALTY CHEMICALS, INC.,**

**et al.,**

**Defendants.**

-----X

Upon the motion of Roy L. Jacobs, attorney for Plaintiff Sandra Lifshitz and said sponsor attorney's affidavit in support:

**IT IS HEREBY ORDERED** that

Applicant's Name: Deborah R. Gross  
Firm Name: LAW OFFICES BERNARD M. GROSS, P.C.  
Address: Suite 450, Wanamaker Bldg., 100 Penn Square East  
City/State/Zip: Philadelphia, PA 19107  
Telephone/Fax: 215-561-3600/215-561-3000  
Email: [debbie@bernardmgross.com](mailto:debbie@bernardmgross.com)

is admitted to practice *pro hac vice* as counsel for Plaintiff Sandra Lifshitz in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated:

New York, NY

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United States District/Magistrate Judge